



Driving progress
through partnership

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May 27, 2025

Via ECF

Honorable Rukhsanah L. Singh, U.S.M.J..
United States District Court, District of New Jersey
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Plaza, 3rd Floor
Newark, New Jersey 07102

Re: In re: Insulin Pricing Litigation, No. 2:23-md-03080-BRM-RLS
Manufacturers' Request to Unseal

Dear Judge Singh:

This firm, along with Kirkland & Ellis, represents Eli Lilly and Company. We write on behalf of all Manufacturer Defendants in connection with the above-referenced matter.

We write to respectfully request that the Court unseal Manufacturers' Response Memorandum Regarding Constructive Notice ("Response") (ECF 563). A corrected version of Exhibit 79 attached to the Response was filed on May 20, 2025. ECF 574. The Response and corrected Exhibit 79 were filed under seal out of an abundance of caution because it was believed that the submission may contain Albany County's confidential information. However, we have since conferred with counsel for Albany County and confirmed that the documents may be filed publicly.

Accordingly, we respectfully request that Your Honor sign the below form of endorsement requesting that the Clerk unseal ECF 563 and 574. Thank you for Your Honor's continued attention to and assistance in this matter.

Respectfully submitted,

Melissa A. Geist

Melissa A. Geist

cc: All Counsel of Record

SO ORDERED on this ____ day of _____, 2025.

Hon. Rukhsanah L. Singh, U.S.M.J.